

16 June 2026

Electricity Authority  
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**Consultation Paper— Improving information on high-voltage network capacity**

Waipā Networks welcomes the opportunity to provide feedback on the Electricity Authority's consultation paper, Improving information on high-voltage network capacity.

Waipā Networks is a consumer trust-owned electricity distributor supplying more than 29,000 connections across Cambridge, Te Awamutu and surrounding areas.

Waipā Networks supports the intent and direction of improving access to high-voltage network capacity information for the public and access seekers considering a connection. We agree that improved network visibility has the potential to support more informed connection and investment decisions, as well as more efficient network planning and operation.

Waipā Networks has been on an ongoing journey to improve our capability in this space. We have created a full high-voltage network model, established a modern GIS platform, and we are in the process of improving high-voltage network data quality. This work is building the foundation for more efficient asset management planning internally and enabling the provision of customer-centric network information externally. Publishing a capacity map, or equivalent customer-facing visibility tool, is a natural extension of this work.

We support the ENA submission regarding this consultation, and in particular, several key concerns as summarised as follows.

We have reservations about the need to proceed through a regulatory pathway. We believe that most EDBs are well on the journey to undertaking this, and we are concerned that regulation might limit innovation or force unnecessary change to developed plans. We are concerned regarding the practicality of the proposed timeframe. The critical issue is not simply producing a map or visual output, but ensuring the underlying capabilities are in place, including having granular data, a structured high-voltage network data model, suitable digital platforms, and repeatable methodologies. If the Authority proceeds with Code amendments, Waipā Networks recommends that the implementation period commence only after the technical specification has been finalised. Waipā Networks also recommends the removal of the non-network alternative disclosure, as we consider this requirement to fall outside the core scope of network visibility and significantly complicate the nature of the proposal.

Our detailed submission responses in the requested format are attached.

Yours sincerely



Weihaio Zhou  
GM – Network Intelligence

## Appendix B Submission form

### Improving information on high-voltage network capacity

Submitter	Waipā Networks
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Questions	Comments
Q1. Do you agree with our assessment of the current state of the information and capabilities needed to inform network hosting capacity? If not, please explain why.	<p>Waipā Network broadly agrees with the Authority's assessment of the current state.</p> <p>We support ENA's submission. Capability and maturity vary across EDBs. The Authority should be cautious about assuming a uniform starting point across all EDBs when assessing implementation costs and timeframes, and the accuracy or meaningfulness of the output (should this proposal go ahead).</p>
Q2. Do you agree that the issues identified by the Authority are worthy of attention? If not, please explain why.	<p>Waipā Networks agrees that improving access to information about network capacity, constraints and hosting capacity is worthy of attention.</p> <p>We support ENA's submission. The paper has not clearly distinguished between issues relating to EDBs' internal visibility of their networks and issues relating to disclosure of network information to access seekers. While both are important, they are distinct issues and may not require the same regulatory response.</p>
Q3. Do you agree with our assessment that now is the time to regulate for network visibility? If not, when do you consider would be the right time?	<p>No.</p> <p>Waipā Networks has been on an ongoing journey to improve our capability in this space. We have created a full high-voltage network model, established a modern GIS platform, and are in the process of improving high-voltage network data quality. This work is building the foundation for more efficient asset management planning internally and enabling the provision of customer-centric network information externally.</p> <p>Irrespective of this proposal, it is our ongoing plan to continue with our data improvement initiatives as the core foundation, with publishing a capacity map, or equivalent customer-facing visibility tool, as a natural extension.</p> <p>Our direction is aligned with the Authority's intended outcome. However, we have reservations about the need to proceed through a regulatory pathway at this time. In particular, we are concerned about the proposed timeframe to deliver the outcome. Refer to our response to Question 7.</p> <p>Waipa believes that most EDBs are well on the journey to undertaking this and we are concerned that regulation might limit innovation or force unnecessary change to developed plans.</p>

Q4. Do you agree with our assessment of the outcomes that network visibility supports? If not, why not?	<p>Waipā Network agrees that improved network visibility has the potential to support more informed connection and investment decisions for some access seekers, and EDB's efficient network operations.</p> <p>We support ENA's submission. The benefits of network visibility may be concentrated amongst a relatively small subset of access seekers with genuine location flexibility, and the proposed network visibility requirements are not considered necessary to enable the development or procurement of non-network solution.</p>
Q5. Do you consider the proposed amendments to Part 6 of the Code would promote the Authority's statutory objective? If not, why not?	We support ENA's submission, that we are not convinced that the Authority has demonstrated that the proposed amendments are the most efficient means of doing so.
Q6. Are there any matters you believe are missing from the proposed Code amendment? Please specify.	No. Waipā Networks does not consider that any significant matters are missing.
Q7. Is the indicative timeframe for implementing the proposed Code amendment likely to be adequate? If not, please provide information supporting a different timeframe, including identifying cost savings from a later implementation date.	<p>Waipā Networks is concerned about the proposed implementation timeframe.</p> <p>From Waipā Networks' perspective, the key issue is not simply the output, but the underlying capability and capability upliftment required to deliver the output. This includes granular data, a structured high-voltage network data model, suitable digital platforms, and repeatable methodologies.</p> <p>As a minimum, Waipā Networks recommends that the implementation period commence only after the technical specification has been finalised, with a minimum 18-month implementation period from that point. This would enable EDBs to understand the scope, plan the required work, and coordinate delivery with other regulatory activities.</p>
Q8. What are your views on the proposed approach where detailed information about the data sets captured within the definition of network capacity information would be contained in technical specifications?	<p>Waipā Networks supports this approach.</p> <p>Technical specifications provide a more flexible mechanism for defining detailed requirements than embedding those requirements directly in the Code.</p>
Q9. Do you consider that the proposal to develop network visibility specifications in consultation with interested parties would be effective? If not, why not?	Yes. Involving EDBs in developing the technical specification will ensure technical practicality and alignment with the different types of data and systems that already exist across the EDBs.
Q.10. Is the proposed timeframe for developing the specifications likely to be sufficient?	<p>The six months appears reasonable. However, the appropriateness also depends on the scope, the level of potential stakeholder engagement required, as well as other regulatory activities occurring at the same time.</p> <p>The requirement for disclosing non-network solutions remains the largest uncertainty regarding determining the timeframe. Refer to our response to Question 24.</p>

Q11. Do you agree with the proposal to start with high-voltage network visibility? If not, please share your perspectives on where best to start.	Yes, Waipā Networks agrees with starting with the HV network. EDBs generally have better visibility of the topology and asset attributes for the HV network, making this a more appropriate start than the LV networks.
Q12. Do you agree with the assumptions the Authority has made? Why/Why not?	No comment.
Q13. Have we correctly identified the benefits of network visibility?	No comment.
Q14. Do you have any information that might help quantify the value of these benefits? If so, please provide this information.	No comment.
Q15. Have we correctly identified the costs of network visibility?	No comment.
Q16. Do you have any information that might help quantify the costs? If so, please provide this information.	<p>Individual EDBs will be best placed to provide detailed information.</p> <p>This HV visibility proposed by the Authority can only be enabled by more granular and structured asset data and a data model, beyond the level enabling Information Disclosure. The costs will be mainly associated with getting the foundational ingredients (i.e. the data, data model, suitable platform hosting the model and algorithm/methodology) available and ready at this level of granularity.</p> <p>For Waipā Networks:</p> <ul style="list-style-type: none"> <li>• Our HV data model and platform are ready, and our main costs are associated with data or data cleansing. Certain HV asset information is in a digitised form – suitable for one-off interpretation and analysis. These need to be fully digitalised into our GIS data model as structured data points that can be interrogated and analysed at scale. Our feasibility assessment concludes that these can only be done manually over 6-12 months with additional temporary resources.</li> <li>• Regarding algorithm and methodology, we aim to learn from and collaborate with peer EDBs who have completed similar work.</li> </ul>
Q17. Have we correctly identified the regulatory overlaps?	<p>Broadly yes.</p> <p>However, Waipa considers that the paper understates the practical burden that can arise when EDBs are required to comply with multiple disclosure regimes that seek similar information but apply different definitions, methodologies, reporting periods or assurance requirements.</p>
Q18. Do you agree with our assessment that there is a net benefit notwithstanding any regulatory overlap? If not, why not?	No comment.
Q19. Do you have any information that might help quantify the costs and benefits associated	No comment.

with the regularly overlap? If so, please provide this information.	
Q20. Do you agree that the Authority should consider reducing the regulatory overlap as the proposed specifications are developed?	Yes, such overlaps should be minimised.
Q21. Do you agree with our assessment that there will be net benefit from the proposed amendments? If not, why not?	No comment.
Q22. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	<p>No.</p> <p>We support ENA's submission. We are not currently persuaded that the proposed amendment is preferable to allowing existing industry-led initiatives to continue maturing. Given the substantial voluntary progress already occurring across the sector, we consider that a less interventionist approach should be more fully evaluated before mandatory requirements are introduced.</p>
Q23. Do you agree the Authority's proposed amendments comply with section 32 of the Electricity Industry Act?	No comment.
Q24. Do you have any comments on the drafting of the proposed amendment?	<p>Two final comments</p> <p><b>Item 1 – Technical wording for SAIDI and SAIFI disclosure</b></p> <p><i>“(dg) no later than 15 September 2027, network maps that show the location of all the distributor's high-voltage network circuits and, for each circuit and each point along the circuit where the design capacity changes the following information:</i></p> <p>....</p> <p><i>(iv) the SAIDI and SAIFI for the immediately preceding 12 months; and”</i></p> <p>SAIDI and SAIFI are suitable for regulatory benchmarking, but they are not necessarily customer-centric for the intended audience and purpose. They are metrics that are generally associated with a system or sub-system, rather than measurements that can be directly associated with each circuit or point along a circuit.</p> <p>SAIDI and SAIFI are also averaged metrics, normalised by the size of the relevant network or system. They are not as meaningful to customers seeking to understand reliability at a particular location for a specific investment decision. Customer may be more interested in interruption counts and durations.</p> <p>Waipā Networks considers this to be a technical drafting matter. The Code could require disclosure of reliability performance, while the technical specification can define suitable customer-centric reliability metrics and the appropriate level of granularity.</p> <p><b>Item 2 – Non-network alternative disclosure</b></p> <p>Waipā Networks is concerned that the proposed requirements relating to alternatives to network reinforcement fall outside the core scope of network</p>

	<p>visibility and significantly complicate the nature of the proposal.</p> <p>Unlike the other elements of the amendment, which relate primarily to disclosure of network information, these provisions would require EDBs to form and publish forward-looking views regarding future technical and operational decisions, procurement intentions, and the expected use of non-network solutions. This assumes that EDBs have reached a similar level of maturity in the assessment and use of non-network solutions.</p> <p>Waipā Networks considers that these matters should be addressed through a dedicated work programme. That work should consider whether any future disclosure requirements are more appropriately addressed through the AMP Information Disclosure pathway, the Code pathway, or another mechanism, rather than through the proposed network visibility amendments.</p>
<p>Please indicate if you wish to be consulted during the development of the technical specifications supporting the proposed Code amendment.</p>	<p>Yes, we like to be consulted during the development of the technical specification.</p>